



**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

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SECURITIES AND EXCHANGE	:	
COMMISSION,	:	
Plaintiff,	:	
-against-	:	Civil Action No. 1:21-cv-00260-PB
LBRY, INC.,	:	
Defendant.	:	

**DEFENDANT LBRY, INC.'S RESPONSES AND OBJECTIONS
TO PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S
SECOND SET OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure (“Federal Rules”) and the Local Rules for the United States District Court for the District of New Hampshire (“Local Rules”), Defendant LBRY, Inc. (“LBRY”), by its attorneys, hereby responds and objects as follows to Plaintiff Securities and Exchange Commission’s (“SEC’s”) Second Set of Interrogatories, including the Definitions and Instructions thereto, dated January 31, 2022 (the “Interrogatories,” and each, an “Interrogatory”). These responses are based on LBRY’s current knowledge, and LBRY reserves the right to supplement or amend each of these responses and objections as discovery progresses.

GENERAL OBJECTIONS

Unless otherwise indicated, the following general objections apply to each numbered Interrogatory as if each was specifically set forth therein, in addition to any specific objection included therein. The assertion of the same, similar or additional objections or the provision of partial answers in the specific responses does not waive any of the general objections.

Interrogatory on the basis that it is not relevant to any claim or defense or proportional to the needs of the case. Subject to and without waiving the foregoing objections, LBRY responds as follows:

Metabase queries data from various databases, each of which has numerous tables, containing multiple fields of data. The databases from which Metabase queries are listed below.

Database	Description
Analytics	Includes diagnostic data from installed LBRY clients (lbry-sdk) from users who have opted into sharing data.
api.odyssey.com	Data that includes, but is not limited to, mailing lists, emails and notifications sent by Odyssey, usage tracking, credit card information, sync data, payment information, and referral tracking.
Cache for big queries	A cache of data used for purposes of running larger queries more quickly.
Chainquery	Information from the Chainquery database (blockchain data from MySQL form).
Comments	Database of comments on published content.
Google Analytics for lbry.com and lbry.tech	Includes website traffic data from Google Analytics.

INTERROGATORY NUMBER 16: Please detail LBRY's use of its own servers (or servers under its control or servers LBRY paid to use) to mirror or host content published by third-parties to the LBRY Network by describing the time periods in which servers were used, the storage capacity of those servers, and the amount spent by LBRY to use those servers.

RESPONSE TO INTERROGATORY NUMBER 16: LBRY incorporates its general objections as if restated herein. LBRY further objects to this Interrogatory as overly broad, unduly burdensome, and not proportional to the needs of the case. Subject to and without waiving the foregoing objections, LBRY responds as follows:

Since approximately the launch of lbry.tv in or around January 2020, LBRY has used servers, totaling in the hundreds, to seed content to its web-based applications. These servers

currently store petabytes of data and cost over \$250,000 per year.

INTERROGATORY NUMBER 17: Please detail all programs by which LBC were granted, awarded, or transferred to third-parties, including computer programmers, software engineers, marketers, users (publishers and content consumers), or other community members. For each program, please detail the criteria for receiving such awards.

RESPONSE TO INTERROGATORY NUMBER 17: LBRY incorporates its general objections as if restated herein. LBRY further objects to this Interrogatory as vague and ambiguous as to the terms “detail” and “programs,” which are undefined and call for an interpretation on the part of LBRY. LBRY further objects to this Interrogatory as cumulative and duplicative to the extent it seeks information that is the subject of other discovery requests propounded by the Commission. Subject to and without waiving the foregoing objections, LBRY responds as follows:

From time to time, and at the discretion and judgment of LBRY employees, LBRY may send LBC to individuals who make certain contributions to the LBRY Network as described in part here: <https://lbry.com/faq/appreciation> and here: <https://lbry.tech/contribute>, and as reflected in LBRY’s quarterly credit reports available at <https://lbry.com/credit-reports> and produced at LBRY_SEC00056549.

INTERROGATORY NUMBER 18: For each digital asset trading platform on which LBRY has sold or bought LBC outside of its market making activities, please state the total number of LBC sold; LBC purchased; and the time period of the purchases and sales. Please do not include any purchases or sales directly resulting from LBRY’s market making.

RESPONSE TO INTERROGATORY NUMBER 18: LBRY incorporates its general objections as if restated herein. LBRY further objects to this Interrogatory as overbroad, unduly burdensome, and not proportional to the needs of the case because it is duplicative of other requests to LBRY and to third parties regarding purchases and sales of LBC. Subject to and without